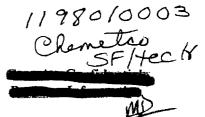
08-37820

US EPA RECORDS CENTER REGION 5





## ROBINSON BRADSHAW & HINSON

May 23, 2008

VIA FED EX

Erin J. Rednour, Remedial Project Manager Illinois Environmental Protection Agency Bureau of Land Division of Remediation Management Mailcode 24 Post Office Box 19276 Springfield, Illinois 62794-9276

Techlaw Atttn: Ann Anderson 205 West Wacker Drive **Suite 1622** Chicago, Illinois 60606

Dear Ms. Rednour:

FILE COPY

This letter is written on behalf of CommScope, Inc. ("Respondent") and is in response to a request for information (the "Information Request") by the Illinois Environmental Protection Agency (the "Illinois EPA") dated February 22, 2008 and concerning the Chemetco, Inc. site in Hartford, Illinois (the "Chemetco Site"). Robinson, Bradshaw & Hinson, P.A. has been retained by Respondent with regard to the above-referenced matter, and this response is made in accordance with the extended due date confirmed in electronic correspondence with Mr. Mike Roubitchek dated February 28, 2008 providing that no response shall be due before May 27, 2008.

At the outset, Respondent objects to the scope of the Information Request. Illinois EPA seeks information pursuant to §4(e) of the Illinois Environmental Protection Act and §104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA") as amended by the Superfund Amendments and Reauthorization Act of 1986 ("<u>SARA</u>").

§104(e) of CERCLA, as amended by SARA, authorizes Illinois EPA to request information concerning only: (1) the identification, nature and quantity of materials at or transported to a "facility," as that term is defined by CERCLA; (2) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at a facility; and (3) the ability of a person to pay for or perform a cleanup. Moreover, §104(e)(1) limits the exercise of Illinois EPA's investigative authority to instances which involve "determining the need for response, or choosing or taking any response action under this subchapter, or otherwise enforcing the provisions of this subchapter."

Notwithstanding the narrowness of this section and its discreteness in terms of specific areas of inquiry, the Illinois EPA has requested information about several areas which go far

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Attorneys at Law 101 North Tryon Street, Suite 1900, Charlotte, NC 28246 Charlotte, NC Chapel Hill, NC Rock Hill, SC

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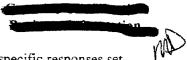
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# Chemetco Site CERCLA §104(e) Information Request Page 2 of 19



beyond the scope of §104(e). Objections on these bases are noted in the specific responses set forth below.

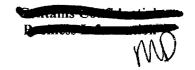
In addition, these responses include proprietary information and documents. In accordance with the provisions of 42 U.S.C. §§6927(b) and 9604(e)(7) and other relevant statutes and regulations. Respondent requests that the information and the documents be considered confidential since, as evident from their contents, the information and documents, if made public, would divulge information entitled to protection under 18 U.S.C. §1905.

In many cases, the designation of a document as responsive to this Information Request (or as not responsive, as the case may be) calls for the exercise of judgment upon which there may be reasonable disagreement. The designation of a document as responsive to this Information Request (or as not responsive, as the case may be) is not meant to preclude a redesignation of the document if such redesignation is later determined to be more appropriate. The fact that a document is designated as responsive to the Information Request shall not be deemed as an admission to matters not specifically contained within the document, as each document speaks for itself. These designations represent a good-faith effort to be responsive to the Information Request despite specific information requests that are not always-clear as to the intended scope or purpose.

Subject to the foregoing, Respondent replies to the Information Request as follows:

[response continues on following page]

Chemetco Site CERCLA §104(e) Information Request Page 3 of 19



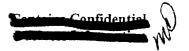
### COMMSCOPE, INC.

### RESPONSE TO REQUEST FOR INFORMATION

### Questions and Responses

1. Identify the person(s) answering this Information Request on behalf of the Respondent.

William W. Toole Environmental Counsel Robinson, Bradshaw & Hinson, P.A. 101 N. Tryon Street, Suite 1900 Charlotte, NC 28246 704-377-8373 Daniel B. Vorhaus Environmental Counsel Robinson, Bradshaw & Hinson, P.A. 101 N. Tryon Street, Suite 1900 Charlotte, NC 28246 704-377-8111



2. Identify all person(s) consulted in the preparation of the answers to these questions.

The following individuals were consulted in the preparation of the answers to these questions:

John E. Moore Corporate Manager Environmental, Health and Conservation and Recycling Manager Safety CommScope, Inc. 1100 CommScope Pl Se Hickory, NC 28603 828-324-2200

Gerry Cooper CommScope, Inc. 6519 CommScope Rd Catawba, NC 28609-0199 828-241-3142

Charles J. Rowe Vice President Gateway Recovery, Inc. CommScope Account Manager 173 Orbit Road Statesville, NC 28677 704-883-8642 x12

Angie Sherrill Recycling Clerk CommScope, Inc. 6519 CommScope Rd Catawba, NC 28609-0199 828-241-6271

June Elmore Credit Services Manager CommScope, Inc. 1100 CommScope Pl Se Hickory, NC 28603 828-324-2200

Marva Caldwell Disbursements Manager CommScope, Inc. 6519 CommScope Rd Catawba, NC 28609-0199 828-324-2200

Rose Sipe Accounting Clerk CommScope, Inc. 6519 CommScope Rd Catawba, NC 28609-0199 828-241-6106

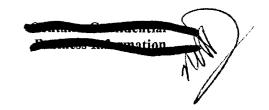
3. Identify the parent corporation and all subsidiaries of the Respondent.

Respondent objects to this request as overly broad and not within the scope of information Illinois EPA is authorized to request, specifically insofar as the question is not relevant to the identification of materials transported to the Chemetco Site, the nature of hazardous substances released at the Chemetco Site or the ability of Commscope to pay for a cleanup at the Chemetco Site. Without waiver of the foregoing objections, Respondent has identified itself and its subsidiaries as follows:

# Chemetco Site CERCLA §104(e) Information Request Page 5 of 19

Attachment #1

CommScope, Inc. Subsidiaries



4. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide copies of all such documents.

Respondent incorporates herein by reference its response to Question number 6, including the documents referenced and attached thereto. In addition, Respondent attaches the following document:

Attachment #2 Customer Inquiry and Chemetco Billing and Invoice Records

This attachment represents the extent of Respondent's internal records regarding transactions between Respondent and Chemetco occurring at any time prior to, during or subsequent to the Bid Period (defined below). A customer inquiry record was generated for "Chemetco," along with known variants or linked accounts, in the Accounts Receivable Database computerized system and the attached spreadsheet represents Respondent's complete records concerning all Chemetco billing and invoicing. For ease of reference in reviewing the attachment, the spreadsheet column "Quantity Ordered" indicates, for a particular transaction, the number of pounds of Copper Scrap ordered by Chemetco and delivered by Respondent, while the column "Amount Ordered" indicates the amount billed for such order.

5. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide the current or most recent known address and telephone number of each individual identified.

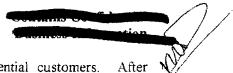
Respondent incorporates herein by reference its responses to Questions number 2 and number 9. Respondent has no reason to believe that there are any additional individuals able to provide more detailed or complete information with respect to any question or response contained in the Information Request.

6. Describe your company's business activities which resulted in sending material to the Chemetco Site.

At no time did Respondent send any materials to the Chemetco Site. Respondent conducted all of its transactions involving Chemetco exclusively with a Chemetco facility located at 3445 Spencer St., Charlotte, NC 28205 (the "Charlotte Plant").

Respondent manufacturers telecommunications cables, among other products. As part of Respondent's ordinary manufacturing operations, Respondent collects scrap communications cables and other ancillary materials for sale at competitive prices. Respondent's relationship with Chemetco commenced in December of 1999. On December 17, 1999, in the ordinary course of its business, Respondent distributed a letter offering 18 separate categories of scrap material for sale to the highest bidder, separately or together, with the winning bids to be those that generated the greatest revenues for Respondent from a creditworthy customer. By January

# Chemetco Site CERCLA §104(e) Information Request Page 6 of 19



of 2000, Respondent received reply bids from more than 65 potential customers. After evaluating the bids, Respondent selected Chemetco's bid as the winning bid with respect to 3 of the 18 categories of scrap material, copper #1 scrap, #2 copper scrap and copper turnings (collectively the "Copper Scrap"), each of which is more fully described as follows:

- (a) Copper #1 scrap: No. 1 bare, uncoated, unalloyed copper wire and copper strip, not smaller than No. 16 B & S wire gauge, and free of insulation and burnt wire which is brittle;
- (b) Copper #2 scrap: miscellaneous, unalloyed copper wire and copper strip consisting of approximately 87% all copper scrap, approximately 10% tin clad copper wire and approximately 3% silver clad copper wire and being smaller than No. 16 B & S wire gauge. The copper #2 scrap would generally not have included the following: excessively leaded, tinned or soldered copper wire; brass and bronze wire; excessive oil content, iron and non-metallics; copper wire from burning or containing insulation; burnt wire which is brittle; or significant amounts of ash; and
- (c) <u>Copper turnings</u>: bare, uncoated, unalloyed copper strip less than 1/8 of an inch in length and free of insulation and burnt wire which is brittle, produced by an edge welding process at Respondent's facilities in Statesville, North Carolina and Newton, North Carolina and coated with small amounts of dirt and one of two water-based cutting fluids (each a "<u>Copper Cutting Fluid</u>").

None of the Copper Scrap contained any insulation at any time while in Respondent's possession. The material safety data sheets for the Copper Cutting Fluids used at the Statesville and Newton facilities are attached hereto.

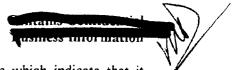
Attachment #3 Copper Cutting Fluid Material Safety Data Sheets

The purchase price for Chemetco's winning bid was derived by applying a predetermined discount to the New York Commodities Exchange spot price for the commodity in question at the time of shipment (the "COMEX Price"). During the Bid Period, the Charlotte Plant purchased the Copper Scrap at the following rates:

- (a) Copper #1 scrap: at a discount of \$0.0448 off of the COMEX Price;
- (b) Copper #2 scrap: at a discount of \$0.1348 off of the COMEX Price; and
- (c) <u>Copper turnings</u>: at a discount of \$0.1538 off of the COMEX Price.

Although the bid request letter states that the contract period was to run from February 1, 2000 through January 31, 2001, Charles J. Rowe, Respondent's Conservation & Recycling Manager at that time and the individual responsible for reviewing and selecting the winning bid contract, has stated that the process of evaluating the large number of bids was delayed and that the sale of Copper Scrap to the Charlotte Plant did not commence until approximately March of 2000 or

# Chemetco Site CERCLA §104(e) Information Request Page 7 of 19



later. Respondent has conducted an exhaustive search of its records which indicate that it shipped Copper Scrap to the Charlotte Plant solely during the period from June 15, 2000 until March 12, 2001 (the "Bid Period"). Illinois EPA has provided Respondent with information from an unknown source indicating that Chemetco purchased Copper Scrap from Respondent during the period from March of 2000 until June of 2000, in addition to the Copper Scrap that it purchased during the Bid Period. Despite its best efforts Respondent has been unable to confirm that such sales took place.

Throughout the Bid Period, each shipment from Respondent to the Charlotte Plant originated at Respondent's facility located at 6519 CommScope Road, Catawba, NC 28609 (the "Catawba Facility"). The Copper Scrap, which was generated by several of Respondent's facilities, was aggregated at the Catawba facility where employees knowledgeable of and trained in Respondent's scrap recycling and resale methods and procedures collected, cleaned and sorted the Copper Scrap and then prepared and packaged it for sale.

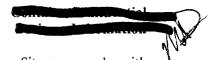
Copper #1 scrap and copper #2 scrap were collected, separately packaged in one or more 4' x 4' x 4' Gaylord boxes and then affixed to wooden pallets for shipment. Copper turnings were separately loaded into the Gaylord boxes using industry standard packaging methods, including double-lining of the Gaylord boxes and usage of a commercially available absorbent (Pig sock, or equivalent) at the bottom of the boxes, to prevent leakage of residual Copper Cutting Fluid, if any. The copper turnings were then similarly loaded on the pallets and readied for shipment.

Pursuant to the bid contract between Respondent and Chemetco, and as with the majority of all of its sales (including those for finished cable on reels) made during the Bid Period, Respondent paid the freight and delivery costs for the shipments of Copper Scrap to the Charlotte Plant. Each shipment was sent directly from the Catawba Facility to the Charlotte Plant. At no time before, during or after the Bid Period did Respondent deliver any Copper Scrap or other material to the Chemetco Site.

Once the shipments were delivered to the Charlotte Plant the sale of the Copper Scrap was complete, the shipment was invoiced and recorded, and Respondent permanently and irrevocably relinquished control of the Copper Scrap in favor of Chemetco. Respondent's records indicate that on four occasions Chemetco was issued an account credit for Copper Scrap overcharges or double billing; however, on no occasion did Chemetco ever seek to return or resell, or Respondent accept for return or repurchase, any Copper Scrap sold to Chemetco by Respondent. Over the course of the Bid Period Respondent's productive use of its Copper Scrap, as described herein, resulted in the delivery of 998,267 pounds and the net sale of \$743,660 of Copper Scrap to Chemetco.

At no time prior to, during or subsequent to the Bid Period did Respondent (i) know of the existence of the Chemetco Site; (ii) arrange for or approve Chemetco's shipments, if any, of Copper Scrap from the Charlotte Plant to the Chemetco Site; (iii) arrange for the disposal or treatment of any hazardous substance by Chemetco; (iv) exercise, attempt to exercise or have the ability to exercise control over the manner in which Chemetco used the Copper Scrap or chose to handle or dispose of the byproducts, waste products or other products resulting from Chemetco's processes; or (v) receive any information concerning the failure or alleged failure of Chemetco at

# Chemetco Site CERCLA §104(e) Information Request Page 8 of 19



any of its sites, including both the Charlotte Plant and the Chemetco Site, to comply with applicable Federal, State, or local environmental regulations or standards, and any amendments thereto. Respondent's sale of Copper Scrap to Chemetco was at all times an arms' length transaction involving the sale of raw materials to a customer for future use in its processes.

7. Identify all persons having knowledge or information about the generation, transportation to, treatment, disposal, or other handling of hazardous substances (including materials containing lead, cadmium, boron, copper, iron, manganese, mercury, nickel, selenium, sulfate, zinc or other heavy metals), by you, your contractors, subcontractors or by prior owners and/operators which relates or may relate to the Chemetco Site, including but not limited to persons who arranged for disposal of or transported hazardous substances to the Chemetco Site.

Respondent incorporates herein by reference its responses to Question number 6 and Question Number 2 and reiterates that it did not generate, transport, treat, dispose or otherwise handle any hazardous substance which relates to the Chemetco Site but that it did sell and deliver Copper Scrap to the Charlotte Plant.

8. Describe your policies and procedures for the handling, treatment, storage and/or disposal of hazardous substances encountered in the course of your activities at the Site. Provide copies of records relating to this policy as well as to its implementation.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, arrange for the handling, treatment, storage and/or disposal of any substance or material, including any hazardous substance, at the Chemetco Site. Without waiver of the foregoing objections, Respondent has provided the following polices and procedures:

Attachment #4 CommScope Scrap Processing Procedure

Attachment #5 CommScope Scrap Flow Table

Attachment #6 CommScope Chemical Disposal Guidelines

Attachment #7 CommScope Recycle – Reuse Guidelines

9. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g., responsibility for the disposal treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). For each, indicate the dates of the individual's employment and the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would possess.

Respondent incorporates herein by reference its above-stated objections and specifically objects to the information request as not reasonably relevant to the Illinois EPA's basic inquiry insofar as it seeks information that does not concern Respondent's activities with respect to either

Chemetco Site CERCLA §104(e) Information Request Page 9 of 19



Chemetco or the Chemetco Site. Without waiver of the foregoing objections, the individuals who had responsibility for Respondent's environmental matters during the Bid Period are listed as follows:

Name		Title		<u>Dates</u>		Description
Charles Rowe	J.	Conservation Recycling Manager	&	10/1/98 12/31/00	-	See Attachment #8 - CommScope Recycling & Conservation Manager Job Description
Richard Burch		Conservation Recycling Manager	&	12/31/00 12/31/05	_	See Attachment #8 - CommScope Recycling & Conservation Manager Job Description

10. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. 9627, sent to the Chemetco Site.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, send any material to the Chemetco Site for purposes of recycling or for any other purpose.

11. Was any shipment of material sent to the Chemetco Site ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, ship any material to the Chemetco Site.

Was any material shipment sent to the Chemetco Site ever subject of a change in payment terms because of increase of handling costs or any problem with the material sent to the Site? If so, describe this event in detail, including its cause and outcome.

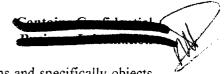
Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, ship any material to the Chemetco Site.

13. Provide copies of the Material Data Safety Sheets for any materials disposed of or shipped to or stored at the Chemetco Site.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that at no time did it arrange to have any material disposed of or shipped to or stored at the Chemetco Site.

14. Have you ever received a formal Information Request [similar to this one] from local, state or federal government concerning the recycling of materials at other scrap yards? Provide a copy of the Request and your response.

# Chemetco Site CERCLA §104(e) Information Request Page 10 of 19



Respondent incorporates herein by reference its above-stated objections and specifically objects to the information request as not reasonably relevant to the Illinois EPA's basic inquiry insofar as it seeks information that does not concern Respondent's activities with respect to either Chemetco or the Chemetco Site and insofar as Illinois EPA has not specified what constitutes a "scrap yard" or whether the Chemetco Site was itself a "scrap yard."

15. Specify whether your company was ever the subject of legal action by any party, including the government, by virtue of your transportation of hazardous substances or other waste materials to the Site. If so, describe in detail and provide any records associated with such legal action.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or arrange for the transportation of any substance, including hazardous substances or other waste materials, to the Chemetco Site.

16. Identify all liability insurance policies held by Respondent from the period you transported materials or other waste materials to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration date for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. Provide complete copies of all relevant insurance policies.

Respondent incorporates herein by reference (a) its above-stated objections and specifically objects to the information request as not reasonably relevant to the Illinois EPA's basic inquiry insofar as it seeks information that does not concern Respondent's activities with respect to either Chemetco or the Chemetco Site and (b) its response to Question number 6 and reiterates that it did not, at any time, transport or arrange for the transportation of any material to the Chemetco Site.

17. List all USEPA, RCRA and State of Illinois Identification Number(s) of your company.

Respondent incorporates herein by reference its above-stated objections and specifically objects to the information request as not reasonably relevant to the Illinois EPA's basic inquiry insofar as it seeks information that does not concern Respondent's activities with respect to either Chemetco or the Chemetco Site. Without waiver of the foregoing objections Respondent sets forth its USEPA RCRA numbers in the attachment hereto and furthermore affirms that it has not been issued or required to be issued any State of Illinois Identification Numbers.

Attachment #8 CommScope Manufacturing Facilities USEPA RCRA Numbers

18. Identify all transactions or agreements for disposal in which your company disposed of, arranged for the disposal or treatment of, transported, or arranged for the transportation of any material or item, scrap materials, waste materials to the Site (including but not limited to drosses, slags, sludges, powders, or combustible materials). In addition:

# Chemetco Site CERCLA §104(e) Information Request Page 11 of 19

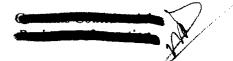


- (a) Identify whether the materials were sent pursuant to a contractual arrangement and, if so, describe the terms of that arrangement.
- (b) Identify whether the materials were delivered directly to the Chemetco site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.
- (c) Identify the persons involved in sending such material to the Site.
- (d) State the dates on which each such persons may have transported or delivered for transport such material.
- (e) Describe the source of or the process that produced the materials.
- (f) Describe the materials or items, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.
- (g) Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.
- (h) State whether any of the material was ever tested by your company and if so, whether the hazardous substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. 261, Subpart C.
- (i) Describe what was done to materials once they were brought to the Chemetco Site, including any further processing of the materials.
- (j) Describe as precisely as possible any and all of the locations at which each hazardous material involved in such transactions actually was disposed or treated.
- (k) Describe any measures taken by the Respondent prior to or during each arrangement to determine the compliance history of the Site where the treatment of disposal would actually take place.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or disposal of, any substance or material, including hazardous substances or other waste materials, at or to the Chemetco Site.

- 19. Describe in general detail the types of material that your company arranged for the transportation of or transported for recycling at Chemetco. In your response, please provide answers to the following questions:
  - (a) Give the generic name of each type of materials shipped to Chemetco (e.g., scrap metal, batteries, scrap paper, scrap plastic, scrap textile (scrap material), scrap electronic equipment, etc.),

# Chemetco Site CERCLA §104(e) Information Request Page 12 of 19



(b) Specify the quantity (volume and weight) of materials your company sent to Chemetco for recycling on a year by year basis.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or disposal of, any substance or material, including hazardous substances or other waste materials, at or to the Chemetco Site.

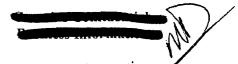
20. Provide any additional information and all documents that you believe relate to the type, nature and characteristics of the materials your company sent to the Chemetco Site.

Respondent incorporates herein by reference its responses to Question number 6 and Question number 4 and reiterates that it did not, at any time, send any materials to the Chemetco Site.

### Questions and Requests for Documents Related to Scrap Metal

- 21. For the following questions which relate to transactions involving scrap metals, provide the requested information and also provide copies of any documents that contain any information that is related to the response:
  - (a) List the years in which your company sent scrap metal to Chemetco and/or broker for recycling. In this list state the type and approximate quantity, volume and weight of scrap metal sent for each year.
  - (b) Did a market exist for the scrap metal listed in your response to 21 (a) above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
  - (c) What commercial specification grade did the scrap metal listed in your response to question 21(a) meet? Identify/list the commercial specification grades that each scrap metal identified in 21(a) met.
  - (d) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question 21(a)? Did this include burning as fuel, or for energy recovery, or incineration?
  - (e) After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question 21(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
  - (f) Could the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

# Chemetco Site CERCLA §104(e) Information Request Page 13 of 19



- (g) Could any products made from the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
- (h) Did your company melt the scrap metal listed in your response to question 21(a) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether Chemetco ever received for processing "dross" or "skimmings" or "sludges" at the Site.
- (i) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?
- (j) Describe the source of or the process that produced the materials.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or disposal of, any substance or material, including hazardous substances or other waste or scrap materials, at or to the Chemetco Site.

22. Did any of the scrap material sent to Chemetco contain other material(s) incident to or adhering to the scrap? If so, describe in detail.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, send any scrap material or other material to the Chemetco Site.

Did any of the material sent to Chemetco contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at Chemetco, after being received at the Site, or was the wire not stripped?

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, send any scrap material or other material to the Chemetco Site.

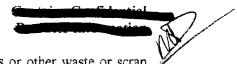
24. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, ship any scrap material or other material to the Chemetco Site.

25. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question 21(a).

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or

# Chemetco Site CERCLA §104(e) Information Request Page 14 of 19



disposal of, any substance or material, including hazardous substances or other waste or scrap materials, at or to the Chemetco Site.

What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or local environmental regulations or standards, and any amendments, with respect to scrap metal?

Respondent incorporates herein by reference its response to Question number 6.

27. Describe the efforts your company undertook with respect to the management and handling of the scrap metal listed in your response to question 21(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or disposal of, any substance or material, including hazardous substances or other waste or scrap materials, at or to the Chemetco Site.

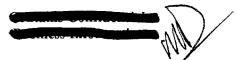
28. Provide all information in your possession that shows that your company was in compliance with applicable Federal, State, and local environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question 21(a).

Respondent incorporates herein by reference its response to Question number 6 and reiterates that it did not, at any time, transport or dispose, or arrange for the transportation, treatment or disposal of, any substance or material, including hazardous substances or other waste or scrap materials, at or to the Chemetco Site.

### Questions and Request for Documents Related to Batteries

- 29. For the following questions which relate to transactions involving batteries (lead-acid batteries, nickel-cadmium batteries, reject batteries, lithium, and other spent batteries), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
  - (a) Provide an estimate of all shipments of whole batteries sent to the Site on an annual basis. In this list, provide an approximation of number of batteries, type of battery (e.g., lead-acid, nickel-cadmium, lithium, reject, or other) and quantity sent.
  - (b) What commercial specification grade did the batteries listed in your response to question 29(a) meet? Identify/list the commercial specification grades that each type of battery identified in question 29(a) met.

# Chemetco Site CERCLA §104(e) Information Request Page 15 of 19



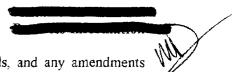
- (c) Did a market exist for the batteries listed in your response to question 29(a)? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
- (d) At the time of the transaction, what was the intended disposition of the batteries listed in your response to question 29(a)?
- (e) What portion of the batteries listed in your response to question 29(a) were to be made available for use as a feedstock for manufacturing new saleable products? Explain how the portion identified in this answer was derived or calculated.
- (f) Could the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
- (g) Could any products to be made from the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
- (h) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.
- (i) What, if any, components of the whole batteries listed in your response to question 29(a) were removed before transport to the Site? Describe what was removed, and where such removal occurred. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
- (j) Were the components of the whole batteries removed once delivered to the Chemetco Site? Describe the method used to recover the components. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
- (k) Describe the source of or the process that produced the materials.

Respondent has not participated with Chemetco in any transaction involving batteries.

30. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the batteries identified in your response to question 29(a).

Respondent incorporates herein by reference its response to Question number 29.

What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable



Federal, State, or Local environmental regulations or standards, and any amendments with respect to batteries?

Respondent incorporates herein by reference its response to Question number 29.

32. Describe the efforts your company undertook with respect to the management and handling of the batteries listed in your response to question 29(a), including the extent to which you complied with customary industry practices current at the time of the transaction, designed to minimize contamination of the Site and/or releases of hazardous substances at the Chemetco Site.

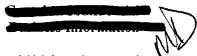
Respondent incorporates herein by reference its response to Question number 29.

Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of batteries listed in your response to question 29(a).

Respondent incorporates herein by reference its response to Question number 29.

- 34. For the following questions which relate to transactions involving scrap paper, plastic, glass, textiles or rubber (scrap material), provide requested information, and also provide copies of any documents that contain any information that is related to the response:
  - (a) Provide an estimate of all shipments of scrap paper, plastic, glass, textile or rubber your company sent to Chemetco on an annual basis. In this list, include the type and an estimate of the quantity, volume and weight of scrap material sent to the Site each year.
  - (b) What commercial specification grade did the scrap material listed in your response to question 36(a) meet? List/identify the commercial specification grades that each scrap material identified in 36(a) met.
  - (c) Did a market exist for the scrap materials listed in your response to question 34(a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
  - (d) At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 34(a)? Did the intended disposition include burning as a fuel, or for energy recovery or incineration?
  - (e) After sale, transfer, delivery, or disposal, what portion of the scrap material listed in your response to question 36(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

# Chemetco Site CERCLA §104(e) Information Request Page 17 of 19



- (f) Could the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
- (g) Could any products to be made from the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
- (h) Describe the source of or the process that produced the materials.

Respondent has not participated with Chemetco in any transaction involving scrap paper, plastic, glass, textiles or rubber.

Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap material identified in your response to question 34(a).

Respondent incorporates herein by reference its response to Question number 34.

36. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to scrap material?

Respondent incorporates herein by reference its response to Question number 34.

37. Describe the efforts of your company undertook with respect to the management and handling of the scrap material listed in your response to question 34(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

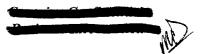
Respondent incorporates herein by reference its response to Question number 34.

38. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap material listed in your response to question 34(a).

Respondent incorporates herein by reference its response to Question number 34.

### Questions and Request for Documents Related to Electrical and Electronic Equipment

- 39. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
  - (a) List an estimated number of shipments of electrical and electronic equipment your company sent to Chemetco on an annual basis. In this list, include the following:



- i. the type and quantity, volume and weight of electrical and electronic equipment sent;
- ii. the amount paid or collected in connection with the transaction for each category of electrical and electronic equipment and the method of payment.
- (b) At the time of the transaction(s), what was the intended deposition of the electrical and electronic equipment listed in your response to question 39(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?
- (c) Describe the source of or the process that produced the materials.

Respondent has not participated with Chemetco in any transaction involving electrical or electronic equipment.

40. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the electrical and electronic equipment identified in your response to question 39(a).

Respondent incorporates herein by reference its response to Question number 39.

What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to electrical and electronic equipment?

Respondent incorporates herein by reference its response to Question number 39.

42. Describe the efforts your company undertook with respect to the management and handling of the electrical and electronic equipment listed in your response to question 39(a), including the extent to which your company complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

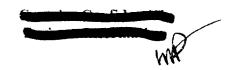
Respondent incorporates herein by reference its response to Question number 39.

Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of the electrical and electronic equipment listed in your response to question 39(a).

Respondent incorporates herein by reference its response to Question number 39.

[signature appears on the following page]

# Chemetco Site CERCLA §104(e) Information Request Page 19 of 19



If you have further questions please do not hesitate to contact either me or my colleague. Daniel Vorhaus.

Sincerely,

ROBINSON, BRADSHAW & HINSON, P.A.

William W. Toole

WWT/dbv

Enclosures

cc: John E. Moore

Frank B. Wyatt, II

## ATTACHMENT #1

CommScope, Inc. Subsidiaries

### COMMSCOPE, INC. SUBSIDIARIES

Name	Jurisdiction of Incorporation/Organization
CommScope, Inc. (Registrant)	Delaware.
CommScope, Inc. of North Carolina	North Carolina
Andrew Corporation	Delaware
Andrew AG	Switzerland
Andrew Telecommunications (India) Private Limited	India.
Andrew Corporation Mauritius	Mauritius
Andrew Telecommunication (China) Co., Ltd	China
Allen Telecom LLC	Delawaro
CommScope International Holdings, LLC	Delaware
Connectivity Solutions Manufacturing, Inc. (CSMI)	Delaware
Cable Transport; Inc.	North Carolina

## ATTACHMENT #2

Customer Inquiry and Chemetco Billing and Invoice Records

### CUSTOMER INQUIRY

ACCT NO. --> IL1419

DELETED ACCOUNT

ACCT NAME

CHEMETCO

OLDENBERG ROAD

RT 3

HARTFORD

IL

62048

VALUE OF OPEN ORDERS

SORT NAME

CHEMETCO

SLSMN

60

OPEN ACCOUNTS RECEIVABLE INFORMATION

TERMS CLS/GRP

73.

19KA NETWORK CABLE (ALL)

TAI

D1

SOLDTO

TX2340

DATE ENTERED

87/05/06

CREDIT REVIEW 0/00/00

PRESS ENTER TO CONTINUE OR CMD-6 TO DISPLAY AND/OR KEY COMMENTS CMD-8 TO ENTER PHONE# INFO OR CMD-5 TO DISPLAY AND/OR KEY CUSTOMER HISTORY

Order	Order	Alpha	Quantity	Amount	Ship To		Ln	2nd Item	Request	Invoice	Invoice	Invoice	
Number	Type	Sold To Name	Ordered	Ordered	Number	Item Description	Ty	Number	Date	Number	Type	Date	G/L Date
12827		125562 CHEMETCO	29015	21,825.08	125562	COPPER #1 SCRAP	17	S0005	6/15/2000	495880	RM	6/16/2000	6/19/2000
12827	CO	125562 CHEMETCO	11055	7 320.62	125562	COPPER #2 SCRAP	17	\$0006	6/15/2000	495880	RM	6/16/2000	6/19/2000
13182	CO	125562 CHEMETCO	45580	30,775.62	125562	COPPER #2 SCRAP	17	S0006	6/21/2000	498457	RM	6/22/2000	6/22/2000
14167		125562 CHEMETCO	6753	5,261.94	125562	COPPER #1 SCRAP	17	S0005	8/7/2000	515403	RM	8/7/2000	8/8/2000
14167	CO	125562 CHEMETCO	36691	25,287 44	125562	COPPER #2 SCRAP	17	S0006	8/7/2000	515403	RM	8/7/2000	8/8/2000
14169	CO	125562 CHEMETCO	17075	13,304.84	125562	COPPER #1 SCRAP	17	S0005	8/7/2000	516752	RM	8/10/2000	8/11/2000
14169	CO	125562 CHEMETCO	24450	16,850.94	125562	COPPER #2 SCRAP	17	S0006	8/7/2000	516752	RM	8/10/2000	8/11/2000
14170	CO	125562 CHEMETCO	19150	15,630,23	125562	COPPER #1 SCRAP	17	80005	8/7/2000	516753	RM	8/10/2000	8/11/2000
14170	CO	125562 CHEMETCO		15,704 08	125562	COPPER #2 SCRAP	17	S0006	8/7/2000	516753	RM	8/10/2000	8/11/2000
14240	CO	125562 CHEMETCO	-4078	-424.11	125562	COPPER TURNINGS	17	S0026	8/15/2000	518515	RM	8/15/2000	8/15/2000
14272	co	125562 CHEMETCO	1	428.01	125562	COPPER TURNINGS	17	S0026	8/15/2000	518547	RM	8/15/2000	8/15/2000
14531	CO	125562 CHEMETCO	43100	31,256.12	125562	COPPER #2 SCRAP	17	\$0006	8/22/2000	521880	RM	8/23/2000	8/23/2000
14657	CO	125562 CHEMETCO	14545	11,842.54	125562	COPPER #1 SCRAP	17	S0005	8/25/2000	524660	RM	8/30/2000	9/1/2000
14657	CO	125562 CHEMETCO	14250	10,319 85	125562	COPPER #2 SCRAP	17	S0006	8/25/2000	524660	RM	8/30/2000	9/1/2000
14657	CO	125562 CHEMETCO	8795	6,193.44	125562	COPPER TURNINGS	17	S0026	8/25/2000	524660	RM	8/30/2000	9/1/2000
14757	CO	125562 CHEMETCO	1525	1,112.03	125562	COPPER TURNINGS	17	S0026	9/12/2000	529834	RM	9/13/2000	9/14/2000
14757	CO	125562 CHEMETCO	33900	25,397.88	125562	COPPER #2 SCRAP	17	S0006	9/12/2000	529834	RM	9/13/2000	9/14/2000
15002	CO	125562 CHEMETCO	1240	951.95	125562	COPPER TURNINGS	17	S0026	9/18/2000	531922	RM	9/18/2000	9/20/2000
15002	CO	125562 CHEMETCO	41185	32,441 42	125562	COPPER #2 SCRAP	17	S0006	9/18/2000	531922	RM	9/18/2000	9/20/2000
15369	CO	125562 CHEMETCO	580	444 11	125562	COPPER TURNINGS	17	S0026	9/26/2000	536404	RM	9/28/2000	9/29/2000
15369	CO	125562 CHEMETCO	40540	31,852.28	125562	COPPER #2 SCRAP	17	S0006	9/26/2000	536404	RM	9/28/2000	9/29/2000
15715		125562 CHEMETCO	1375	1,032.90	125562	COPPER TURNINGS	17	S0026	10/10/2000	541334		10/10/2000	10/11/2000
<b>15</b> 715	CO	125562 CHEMETCO	41070	31,673 18	125562	COPPER #2 SCRAP	17	S0006	10/10/2000	541334	RM	10/10/2000	10/11/2000
15799		125562 CHEMETCO	12670	9,403 67		COPPER TURNINGS	17	S0026	10/16/2000	543670		10/16/2000	_
15799		125562 CHEMETCO	2840	2,420.25		COPPER #1 SCRAP	17	\$0005	10/16/2000	543670		10/16/2000	
15799		125562 CHEMETCO	17755	13,532 86		COPPER #2 SCRAP	17	S0006	10/16/2000	543670		10/16/2000	
15961		125562 CHEMETCO	1945	1,382 31		COPPER TURNINGS	17	S0026	10/24/2000	546868		10/24/2000	
15961		125562 CHEMETCO	2433	1,996.76		COPPER #1 SCRAP	17	S0005	10/24/2000	546868		10/24/2000	
15961		125562 CHEMETCO	34438	25,163.85		COPPER #2 SCRAP	17	S0006	10/24/2000	546868		10/24/2000	
16725		125562 CHEMETCO	1840	1,235.01		COPPER TURNINGS	17	S0026	11/15/2000	556074		11/16/2000	
16725		125562 CHEMETCO	3576	2,793.57		COPPER #1 SCRAP	17	\$0005	11/15/2000	556074		11/16/2000	
16725		125562 CHEMETCO	20074	13,875 15		COPPER #2 SCRAP	17	S0006	11/15/2000	556074		11/16/2000	
16796		125562 CHEMETCO	32340			COPPER #1 SCRAP	17	S0005	11/16/2000	556143		11/16/2000	
16796		125562 CHEMETCO	7955	5,498.50		COPPER #2 SCRAP	17	S0006	11/16/2000	556143		11/16/2000	
17049		125562 CHEMETCO	3350	2,235.12		COPPER TURNINGS	17	S0026	11/21/2000	558461		11/22/2000	
17049		125562 CHEMETCO	4574	3,554.91		COPPER #1 SCRAP	17	S0005	11/21/2000	558461		11/22/2000	
17049		125562 CHEMETCO	23216	15,954.04		COPPER #2 SCRAP	17	S0006	11/21/2000	558461		11/22/2000	
17429		125562 CHEMETCO	31245	26,048.96		COPPER #1 SCRAP	17	S0005	12/11/2000	564716		12/12/2000	
17429		125562 CHEMETCO	9565	7,113.49		COPPER #2 SCRAP	17	\$0006	12/11/2000	564716		12/12/2000	
1/922		125562 CHEMETCO	40500	29,876 85		COPPER #2 SCRAP	17	S0006	12/20/2000	567765		12/21/2000	
18280		125562 CHEMETCO	17568	14,101.83		COPPER #1 SCRAP	17	S0005	1/16/2001	573132		1/16/2001	1/17/2001
18280		125562 CHEMETCO	23722	16,906.67		COPPER #2 SCRAP	17	S0006	1/16/2001	573132		1/16/2001	1/17/2001
18431	UO	125562 CHEMETCO	224	150.8	125562	COPPER TURNINGS	17	S0026	1/19/2001	574113	RM	1/19/2001	1/19/2001

18431 CO	125562 CHEMETCO	28957	22,679.12	125562 COPPER #1 SCRAP	17	\$0005	1/19/2001	574113 RM	1/19/2001	1/19/2001
18431 CO	125562 CHEMETCO	1564	1,084.16	125562 COPPER #2 SCRAP	17	\$0006	1/19/2001	574113 RM	1/19/2001	1/19/2001
18476 CO	125562 CHEMETCO	5188	3,469.22	125562 COPPER TURNINGS	17	S0026	1/23/2001	575072 RM	1/23/2001	1/24/2001
18476 CO	125562 CHEMETCO	6188	4,818.60	125562 COPPER #1 SCRAP	17	S0005	1/23/2001	575072 RM	1/23/2001	1/24/2001
18476 CO	125562 CHEMETCO	23588	16,245.06	125562 COPPER #2 SCRAP	17	S0006	1/23/2001	575072 RM	1/23/2001	1/24/2001
18478 CO	125562 CHEMETCO	2449	1,656.01	125562 COPPER TURNINGS	17	S0026	1/23/2001	575074 RM	1/23/2001	1/24/2001
18478 CO	125562 CHEMETCO	9118	7,442.11	125562 COPPER #1 SCRAP	17	S0005	1/23/2001	575074 RM	1/23/2001	1/24/2001
18478 CO	125562 CHEMETCO	28203	20,481.02	125562 COPPER #2 SCRAP	17	S0006	1/23/2001	575074 RM	1/23/2001	1/24/2001
18647 CO	125562 CHEMETCO	673	460.47	125562 COPPER TURNINGS	17	S0026	1/26/2001	576156 RM	1/26/2001	1/26/2001
18647 CO	125562 CHEMETCO	12994	10,319.83	125562 PE BLEEDOUT SCRAP	17	S0007	1/26/2001	576156 RM	1/26/2001	1/26/2001
18647 CO	125562 CHEMETCO	26208	18,455.67	125562 COPPER #2 SCRAP	17	S0006	1/26/2001	576156 RM	1/26/2001	1/26/2001
18648 CO	125562 CHEMETCO	5188	3,469 22	125562 COPPER TURNINGS	17	S0026	1/26/2001	576157 RM	1/26/2001	1/26/2001
18648 CO	125562 CHEMETCO	6188	4,818 60	125562 COPPER #1 SCRAP	17	S0005	1/26/2001	576157 RM	1/26/2001	1/26/2001
18648 CO	125562 CHEMETCO	23588	16,245.06	125562 COPPER #2 SCRAP	17	\$0006	1/26/2001	576157 RM	1/26/2001	1/26/2001
18714 CO	125562 CHEMETCO	3798	2,640.37	125562 COPPER TURNINGS	17	S0026	2/5/2001	578640 RM	2/6/2001	2/7/2001
18714 CO	125562 CHEMETCO	7652	6,161.39	125562 COPPER #1 SCRAP	17	\$0005	2/5/2001	578640 RM	2/6/2001	2/7/2001
18714 CO	125562 CHEMETCO	26225	18,756 12	125562 COPPER #2 SCRAP	17	S0006	2/5/2001	578640 RM	2/6/2001	2/7/2001
19355 CO	125562 CHEMETCO	14037	10,895.52	125562 COPPER #1 SCRAP	17	\$0005	3/6/2001	586061 RM	3/6/2001	3/8/2001
19355 CO	125562 CHEMETCO	27188	18,656.41	125562 COPPER #2 SCRAP	17	S0006	3/6/2001	586061 RM	3/6/2001	3/8/2001
19377 CO	125562 CHEMETCO	-5188	-3,469.22	125562 COPPER TURNINGS	17	S0026	3/15/2001	590547 RM	3/22/2001	3/23/2001
19377 CO	125562 CHEMETCO	-6188	-4.818 60	125562 COPPER #1 SCRAP	17	S0005	3/15/2001	590547 RM	3/22/2001	3/23/2001
19377 CO	125562 CHEMETCO	-23588	-16,245.06	125562 COPPER #2 SCRAP	17	S0006	3/15/2001	590547 RM	3/22/2001	3/23/2001
19587 CO	125562 CHEMETCO	3001	2,116.31	125562 COPPER TURNINGS	17	\$0026	3/12/2001	588059 RM	3/13/2001	3/13/2001
19587 CO	125562 CHEMETCO	6527	5,320.81	125562 COPPER #1 SCRAP	17	S0005	3/12/2001	588059 RM	3/13/2001	3/13/2001
19587 CO	125562 CHEMETCO	23457	17,011.02	125562 COPPER #2 SCRAP	17	S0006	3/12/2001	588059 RM	3/13/2001	3/13/2001

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## ATTACHMENT #3

Copper Cutting Fluid Material Safety Data Sheets

Page 1 of 7

Reprints/Updates of this OSHA MSDS are available at our website, WWW,MILPRO.COM.

# **VALENITE**®

## MATERIAL SAFETY DATA SHEET

## VALCOOL® VNT® 650

## METALWORKING FLUID CONCENTRATE

MSDS: VC0650 FS: 15-Mar-98: 9454: 1633

DATE EFFECTIVE: 3/28/99

PART # 15-00-542

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION					
Manufacturer:	Emergency Telephone Number: 1-800-424-9300 (CHEMTREC)				
Valenite incorporated	Information Telephone Number: 1-800-488-9073				
31700 Research Park Drive	Generic Name: Water Soluble Metalworking Fluid				
Madison Heights, MI 48071	Concentrate				
	Product Name(s) & Code(s): VNT 650 UNDYED 436; VNT 650 BLUE 435;				

### 2. EMERGENCY INFORMATION

Product is alkaline. Product is a primary eye irritant. Product is combustible. Highway spills could result in slippery conditions. No other significant health effects are associated with this material.

3. POTENTIAL HEALTH EFFECTS OF DIRECT EXPOSURE					
	Product Concentrate	Product at Use Dilution			
Inhalation	Not Applicable.	Extended Exposure to mists may cause upper respiratory irritation.			
Eye Contact	Product is a primary eye irritant.	Will cause stinging sensation in the eye.			
Skin Contact	Product is not a primary skin irritant.	Not irritating to the skin when used as directed and good personal hygiene is practiced.			
Ingestion	Not orally toxic.	Swallowing small quantities may cause nausea or diarrhea.			

When used in applications generating high levels of mist, operator exposure can be minimized by proper ventilation, use of mist collectors or splash guards, as appropriate. If there is doubt about actual mist levels present, monitoring should be conducted.

Mild skin irritation (redness and dryness of hands) may be experienced when the diluted product has been contaminated by certain oils, by dissolved metals, or when mix ratio is too strong. When problems occur, use of water-resistant barrier creams may be a temporary control measure. Contact VALCOOL® Technical Services at 1-800-488-9073 for specific recommendations.

Carcinogen Listings

NTP: No

IARC: No

OSHA: No

Signs and symptoms of exposure: Eye injury may result from contact with concentrated product. Skin irritation can result from improper use and handling of concentrate or mix.

Medical conditions generally aggravated by exposure: May aggravate existing skin irritation where further defatting or skin penetration could occur.

#### 4. EMERGENCY AND FIRST AID PROCEDURES

Eyes: In case of eye contact with concentrated product or diluted mix, flush immediately with running water for 15 minutes, then promptly get medical attention to check for possible irritation.

Skin contact: In case of skin contact with product concentrate, wash with water as soon as possible.

Diluted product is not irritating to the skin when used as recommended and good personal trygiene is practiced. Remove severely contaminated clothing, including shoes. Launder before reuse. If irritation persists, get medical attention.

ingestion: If concentrate or mix is swallowed, do not Induce vomiting. Dilute by drinking water or milk. Immediately contact physician and obtain treatment. Swallowing small quantities of diluted product is not expected to cause injury or illness; but, as should be expected when drinking oily, soapy water, nausea, diambea or abdominal distress may be experienced.

Inhalation: Not expected to be a probable route of exposure to product concentrate, Inhalation of diluted mix can occur in applications where high mist levels are generated. OSHA has set a PEL of 15 mg/M³ for any airborne particulate as a nulsance level of exposure. NIOSH has set a REL of 0.5 mg/M³ for metalworking fluid mist.

### 5. CONTROL MEASURES

Respiratory Protection: Product is not volatile.

Ventilation: For most applications, normal shop ventilation is adequate. However, when high mist tevels are generated or where machines are close together or ventilation is inadequate, operators may experience respiratory irritation. For such applications, use of splash guards or mist collectors is recommended.

Eye Protection: Safety shield or goggles required when handling concentrated product.

Other protective clothing or equipment: Effective metalworking plant protective clothing as appropriate.

Work/Hygiene Practices: Good personal hygiene should always be followed.

Protective Gioves: impervious gloves are recommended when handling product concentrate,

\* 73 72 31 14 For 2000 Blame

1 27 700

#### 8. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

These ingredients may contribute to the acute product hazards listed under the Potential Health Effects section. Other substances, not Hazardous under the OSHA Hazard Communication Standard may be present. Further composition information may be available to health professionals as provided in the Standard.

HAZARDOUS COMPONENTS	CAS#	MAX %
Mineral oil (severely hydrotreated)	64742-52-5	80
Ethanolamine	141-43-5	10
Polyethoxylated propoxylated alcohol	69227-21-0	10

#### 7. FIRE AND EXPLOSION HAZARD DATA

Flash Point (COC): 385°F

Flammable Limits:

Lower Explosive Limit: NA

Upper Explosive Limit: NA

Extinguishing Media: Chemical foam, carbon dioxide, water fog, dry chemical

Special Firefighting Procedure: None

Unusual Fire and Explosion Hazards: None

Hazardous Combustion Products: Smoke, fumes, HCI, oxides of carbon

NFPA/HMIS Codes: Health 1

Flammability 1

Reactivity 0

Other -

### 8. ACCIDENTAL RELEASE MEASURES

Contain the spill, collect on absorbent material and discard as dictated by Federal, state and local regulations that may apply. Flush area thoroughly with water.

Reportable Quantity: None

#### 9. WASTE DISPOSAL

For Used Mix: Disposal procedures must comply with local, county, state and Federal regulations. If pre-treatment is needed, ultrafiltration or emulsion breaking may be used. Contact VALCOOL Technical Services at 1-800-488-9073 for assistance.

For Unused Concentrate: Concentrate is not a hazardous waste, as defined under 40 CFR 261.

1/7/00

"Empty" Containers will contain a residue which is not considered a hazardous waste under RCRA regulations. Drums can be drained to a "drip dry" condition by inversion and can be offered for recycling or scrap.

CAUTION: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE THIS CONTAINER TO HEAT, FLAME, SPARKS OR OTHER SOURCES OF IGNITION: IT MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to clean drums since residue is difficult to remove. Empty drums should be completely drained, promptly bunged, and promptly returned to a drum reconditioner. Empty disposable bulk containers should be drained, sealed, and properly discarded. Empty recyclable bulk containers should be drained, sealed, and recycled. Empty pails and jugs should be drained and properly discarded.

#### 10. HANDLING AND STORAGE

Use only as recommended by Valenite Incorporated. Avoid all contact of concentrate with eyes or skin. Do not swallow, if frozen, thaw completely at room temperature prior to use.

Other Precautions — Product is combustible. Avoid open flames, sparks, and temperatures of 385°F or greater. Contains amines. Do not add sodium nitrite or other nitrosating agents to this product. Suspected cancer-causing nitrosamines could be formed.

11. PHYSICAL/CHEMICAL CHARACTERISTICS						
Boiling Paint	NA	Evaporation Rate	Like water when diluted			
Specific Gravity	1.024	Solubility in Water	100% Miscible			
Vapor Pressure (mm Hg)	NA	Appearance/Odor	Clear, dark amber/chemical			
Melting Point	NA	pH (concentrate)	NA			
Vapor Density	NA	pH 5.0% (mix)	8.9			

Volatile Organic Content (concentrate - by ASTM Method 2369 (Standard Test Method for Volatile Content of Coatings)): 10.24%

12 REACTIVITY
Stability: Slable
Conditions to Avoid: NA
Materials to Avoid: Avoid contact with strong acids or oxidizers to product concentrate.
Hazardous Polymerization; Will not occur.
Combustion Products: Smoke, fumes, HCl, and oxides of carbon

13. TRANSPORT INFORMATION							
	Hazardous Materials Description and Proper Shipping Name (49 CFR 172.101):	Hazard Class					
		(49 CFR 172.101):					
BY LAND	Not a hazardous material.	NA					
BY AIR OR VESSEL (49 CFR 175-176)	NA	NA					
U.S. Harmonized Tariff Code: 3403.19.0000							

14. REGULATORY INFORMATION							
EXPOSURE GUIDELINES							
REGULATED MATERIAL	NIOSH REL	OSHA PEL	OSHA STEL	ACGIH TLV	ACGIH STEL		
Metalworking Fluid Mist	0.5 mg/M <sup>3</sup>						
Mineral oil (mist)		5 mg/M³		5 mg/M <sup>3</sup>			
Ethanolamine		3 ppm		3 ppm	6 ppm		

CERCLA: Components present in this product at a level which could require reporting under 40 CFR 302.4 None

EPCRA (SARA) TITLE III Extremely Hazardous Substances (302): NA

Hazardous Substances (311, 312): Product concentrate is a hazardous substance as defined under the OSHA Hazard Communication Standard and may be reportable under the provisions of SARA Sections 311 and 312.

HAZARD CATEGORIES:

Acute Health: Yes

Chronic Health: No

Fire: Yes

Sudden Release of Pressure: No

Reactive: No

RCRA: Product concentrate does not meet the definition of a hazardous waste as defined under 40 CFR 261. It is possible that in use, the mix may be contaminated by metals or by chlorinated solvents and the final waste may meet the TCLP definition. Each facility should assess each waste stream to determine if the used fluid should be treated as a hazardous waste.

TSCA: The ingredients of this product are on the TSCA inventory.

State Right-to-Know: Many states have enacted Community Right-To-Know laws which require information beyond that mandated by federal laws. Since some of these laws are inconsistent with the federal laws, the information in this sheet may not fully meet the requirements of every state.

Toxic Substances (313): Components present in the product at levels which could require reporting under the statute:

CHEMICAL NAME	CAS#	MAX. %	COMMENTS
Polychlorinated alkanes	none assigned	15	(NOTE: 10,000 lbs alkanes = 142 drums concentrate)

#### **GLOSSARY OF ABBREVIATIONS**

ACGIH	American Confere	ance of Government	tal Industrial Hygienists
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CAS Chemical Abstracts Service

Comprehensive Environmental Response Compensation and Liability Act CERCLA

**CFR** Code of Federal Regulations

COC Cleveland Open Cup

DOT Department of Transportation

**EPCRA** Emergency Planning and Community Right-to Know Act (aka SARA)

International Agency for Research on Cancer IARC

NA Not Applicable

National Institute for Occupational Safety and Health NIOSH

National Toxicology Program NTP

Occupational Safety and Health Administration **OSHA** 

Permissible Exposure Limit PEL

Resource Conservation and Recovery Act RCRA

REL Recommended Exposure Limit

SARA Superfund Amendments and Reauthorization Act STEL Short-Term Exposure Limit

TCLP Toxicity Characteristics Leaching Procedure

TLV Threshold Limit Value

TSCA Toxic Chemicals Control Act

VOC Volatile Organic Compounds

NOTE: The opinions expressed herein are those of qualified experts within Valenite Incorporated and of their suppliers. We believe that the information contained herein is current as of the date of this Material Data Sheet. Since the use of this information and of these opinions and the condition and use of the product are not within the control of Valenite Incorporated, it is the user's obligation to determine the conditions of safe use of the product.

This is the last page

# Material Safety Data Sheet ALKOLUB 8733

#### SECTION I - IDENTIFICATION

MANUFACTURER'S NAME: ...... ALKO AMERICA INDUSTRIAL CORP.

MANUFACTURER'S ADDRESS: .... P.O. BOX 5771 | SPARTANBURG, SC 29304

EMERGENCY PHONE NUMBER ... 864-573-7585

DATE PREPARED: ...... DECEMBER 12, 2000

PRODUCT NAME: APRIL 11, 2005

PRODUCT NAME: ALKOLUB 8733

CHEMICAL DESCRIPTION: .... PROPRIETARY PRODUCT USE: ..... METAL LUBRICANT

### **SECTION II - HAZARDOUS INGREDIENTS**

HAZARDOUS INGREDIENT

NONE

PERCENT

TLV (UNITS)

PRODCAS#

### SECTION III - PHYSICAL DATA

BOILING POINT: ..... 212F

pH 1% SOLUTION:.....3.5

SOLUBILITY IN WATER: SOLUBLE

% MOISTURE: .....

BROOKFIELD VISC, & 75F..... 100 eps

SPECIFIC GRAVITY:.....1.12 g/ml

APPEARANCE AND ODOR: ..... CLEAR STRAW COLORED LIQUID WITH AN ALCOHOLIC ODOR.

MISC, PHYSICAL DATA:......N/A

### SECTION IV - FIRE AND EXPLOSION DATA

FLASHPOINT: ......200F (TCC)

FIRE POINT: ......N/A

EXTINGUISHING MEDIA: WATER SPRAY OR MIST, CO2, DRY CHEMICAL, FOAM.

SPECIAL FIRE FIGHTING PROCEDURES: WEAR A SELF CONTAINED BREATHING APPARATUS WITH A FULL

FACEPIECE OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE DISPLACEMENT MODE.

# Material Safety Data Sheet ALKOLUB 8733

#### **SECTION V - REACTIVITY DATA**

CHEMICAL STABILITY: .....STABLE

CONDITIONS TO AVOID: ......N/A

INCOMPATIBILITY: ST

STRONG OXIDIZERS.

DECOMPOSITION PRODUCTS:

CARBON DIOXIDE, CARBON MONOXIDE AND VARIOUS HYDROCARBONS

MAY BE RELEASED DURING A FIRE.

HAZARDOUS POLYMERIZATION:

WILL NOT OCCUR

#### SECTION VI - HEALTH HAZARD DATA

### THRESHOLD LIMIT VALUE: NOT ESTABLISHED

#### OVER EXPOSURE EFFECTS/ROUTES OF ENTRY:

CAN CAUSE BY BRITATION, PROLONGED OR REPEATED CONTACT WITH THE UNDILUTED PRODUCT CAN CAUSE SKIN DRYNESS OR BRITATION, SWALLOWING THIS PRODUCT MAY CAUSE GASTROINTESTINAL BRITATION, DIARRHEA, NAUSEA, AND VOMITING.

#### FIRST AID PROCEDURES:

FLUSH EYES WITH CLEAN WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION, REMOVE CONTAMINATED CLOTHING AND WASH AFFECTED SKIN AREAS WITH MILD SOAP AND WATER. IN CASE OF INTOXIC ATION, GIVE OXYGEN, AVOID MOUTH-TO-MOUTH RESUSCITATION,

#### CHRONIC OVER EXPOSURE EFFECTS:

V. 4

#### CARCINOGENTLY INFORMATION:

NO COMPONENTS OF THIS PRODUCT ARE LISTED AS A CARCINOGEN BY IARC, NTP, OSHA, OR ACGIH.

#### SECTION VII - SPILL OR LEAK PROCEDURE

#### FOR SPILL:

CONTAIN SPILL AND SALVAGE AS MUCH MATERIAL AS POSSIBLE BY PUMPING TO A SALVAGE TANK OR DRUM. PICK UP REMAINING MATERIAL WITH A SUITABLE ABSORBENT.

#### WASTE DISPOSAL METHOD:

DISPOSE OF ONLY BY METHODS APPROVED BY AND USED IN ACCORD WITH LOCAL, STATE AND FEDERAL REGULATIONS.

# Material Safety Data Sheet ALKOLUB 8733

#### **SECTION VIII - SPECIAL PROTECTION**

### RESPIRATORY PROTECTION:

NOT NORMALLY REQUIRED.

VENTILATION:

LOCAL EXHAUST, GENERAL MECHANICAL.

PROTECTIVE GLOVES:

NEOPRENE OR OTHER CHEMICAL RESISTANT GLOVES.

EYE PROTECTION:

CHEMICAL SPLASH GOGGLES.

OTHER PROTECTIVE EQUIPMENT:

SAFETY SHOWER / EYE BATH.

#### **SECTION IX - SPECIAL PRECAUTIONS**

#### SPECIAL INFORMATION:

STORE AT NORMAL TEMPERATURES AND CONDITIONS OF WAREHOUSING, KEEP CONTAINER CLOSED WHEN NOT IN USE, AVOID ALLOWING PRODUCT TO FREEZE, WASH CONTAMINATED CLOTHING BEFORE RE-WEARING.

NA

DOT HAZARD CLASS: .....N/A

DOT SHIPPING NAME:.....N/A

UN NUMBER: ......N/A

NA NUMBER: ......N/A

ADDITIONAL REGULATORY INFORMATION:

HMIS COR	ES	
HEAL FH	()	
FLAMMABILITY	1	
REACTIVITY	()	
PERS. PROTECTION		

ALL DATA ARE BELIEVED TO BE CORRECT, HOWEVER, THIS SHOULD NOT BE ACCEPTED AS A GUARANTEE OF THEIR ACCURACY WITHOUT CONFIRMING TESTS IN YOUR OWN PLANT OR LABORATORY. THE DATA RELATES ONLY TO THE MATERIAL AS SUPPLIED AND DOES NOT RELATE TO COMBINATIONS WITH OTHER MATERIALS OR PROCESSES. MC-141-16A

CommScope Scrap Processing Procedure

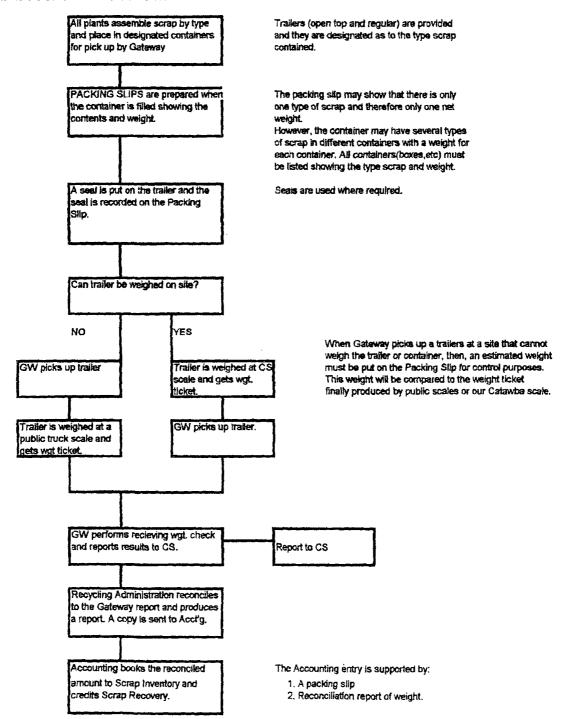
SCRAP PROCESSING PROCEDURE

Except for 6R Contract 2003 -> pro

#### OPERATION:

#### **NARRATIVE:**

#### A. TRANSFER OF SCRAP TO GATEWAY:



THIS COMPLETES THE PROCEDURE FOR THE TRANSFER OF SCRAP TO GATEWAY.

CommScope Scrap Flow Table

Exhib	it	В	
Scrap Flo	W	Ta	bie
How			

		How Packaged Trailer type		Staging location or Trailer location	
	Catawba Plant				
1A.	Trunk cables	Coils, loose	Open top trailer #1	Scrap yard	
1B.	Drop cables	Coils, loose	Open top trailer #2	Scrap yard	
1C.	Trunk cables	Coils	Van trailer	Outside dock	
1D.	CCA	Coils, boxes	Van trailer	Outside dock	
1E.	1350 aluminum strip	Boxes	Van trailer	Outside dock	
1F.	1350 aluminum shavings	Boxes	Van trailer	Outside dock	
1 <b>G</b> .	Poly/aluminum foil tape	Boxes	Van trailer	Outside dock	
1H.	Braidwire, aluminum	Boxes	Van trailer	Outside dock	
11.	Braidwire, copper	Boxes	Van trailer	Outside dock	
1J.	NW copper bearing cables	Boxes	Van trailer	Outside dock	

# **Claremont Plant**

2A.	NW copper bearing cables	Coils	Van trailer #1	Cu cables dock
2B.	Drop cables	Coils	Van trailer #2	CCS cables dock
2C.	NW copper bearing cables	Boxes	Van trailer #3	Misc materials dock
2D.	Drop cables	Boxes	Van trailer #3	Misc materials dock
2E.	Bare copper, heavy guage	Boxes	Van trailer #3	Misc materials dock
2F.	Bare copper, light guage	Boxes	Van trailer #3	Misc materials dock
2G.	Bare plated copper	Boxes	Van trailer #3	Misc materials dock
2H.	Braidwire, aluminum	Boxes	Van trailer #3	Misc materials dock

# Statesville Plant

3A.	CCS	Coils, boxes	Live load	Stage on east patio
3B.	CCA	Coils, boxes	Van trailer	Misc materials dock
3C.	Copper strip	Boxes	Van trailer	Misc materials dock
3D.	Copper edge trim (skive)	Boxes	Van trailer	Misc materials dock
3E.	1350 aluminum shavings	Boxes	Van trailer	Misc materials dock
3F.	1350 aluminum rod	Boxes	Van trailer	Misc materials dock
3G.	5154 aluminum	Boxes	Van trailer	Misc materials dock
3H.	Trunk cables	Coils, boxes	Van trailer	Misc materials dock
31.	Drop cables	Coils, boxes	Van trailer	Misc materials dock

# **Newton Plant**

4A	Copper strip	Boxes	Live load	Stage in plant
48.	CR cable, copper	Loose	Open top bin #1	Outdoor yard
4C.	CR core, copper	Loose	Open top bin #2	Outdoor yard
4D.	CR cable, copper	Bundles, boxes, coils	Van trailer	Dock
4E.	CR cable, alum	Bundles, boxes, coils	Van trailer	Dock
4F.	CR cable, CCA	Bundles,boxes,coils	Van trailer	Dock
4G.	CR cable, braided	Bundles, boxes, coils	Van trailer	Dock
4H.	CR core, copper	Bundles,boxes,coils	Van trailer	Dock
41.	CR core, CCA	Bundles,boxes,coils	Van trailer	Dock
4J.	Copper strip	Boxes	Van trailer	Dock
4K.	Alum strip	Boxes	Van trailer	Dock
4L.	Clean CCA	Boxes	Van trailer	Dock
4M.	Copper turnings	Boxes	Van trailer	Dock
4N.	NW copper bearing cables	Boxes	Van trailer	Dock

\* = baled by CommScope

CommScope Chemical Disposal Guidelines



TOPIC	SECTION
CHEMICAL DISPOSAL GUIDELINES	200.03-PRO

#### 1. OBJECTIVE

1.1. This procedure provides guidelines for the proper management and disposal of chemical wastes. The objective is to ensure the proper disposal of chemical wastes in accordance with all applicable regulations. The management and disposal of chemical wastes are specifically addressed.

NOTE: Radioactive or bio-hazardous materials are not addressed in this procedure.

# 2. SCOPE

2.1. This procedure is written for the CommScope facility employees.

# 3. CONTENTS

- 4.1. Responsibilities
- 4.2. Procedure

#### 4. PROGRAM

#### 4.1. Responsibilities

# 4.1.1. Safety and Environmental Representative

- a. It is the responsibility of the Safety and Environmental Representative to design a
  program for the proper management and disposal of chemical waste materials specific to
  the plant site.
- b. The Safety and Environmental Representative shall assist all departments in determining the proper waste classification and appropriate disposal methods for the chemical wastes generated by the facility.

#### 4.2. Procedure

# 4.2.1. General Guidelines

#### a. Hazardous Waste

- Many chemical wastes are classified as hazardous wastes and must be managed in accordance with federal and/or state regulations.
- These regulations establish standards for container labeling, inspections, recordkeeping, on-site management and ultimate disposal.
- The site environmental representative shall provide specific guidance for hazardous waste management.

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TOPIC	SECTION
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#### b. Nonhazardous Waste

- Nonhazardous chemical waste may be managed as solid waste and disposed of accordingly.
- Care must be taken to ensure that the waste is properly classified as nonhazardous before a decision regarding ultimate disposal is made.

## 4.2.2. Liquid Wastes

# a. Hazardous Liquids

- Hazardous liquid wastes are generally collected for disposal by placing them in a suitable waste disposal container in a satellite accumulation area within the generating area.
- These containers may be small cans (up to 5 gallons) or drums (up to 55 gallons).
- Waste streams should be separated according to compatibility and characteristic classes (i.e., acid, base, ignitable, etc.).
- The amounts of each chemical added to the container must be listed on the container such that all chemical contents and quantities will be known for proper evaluation of disposal.
- When full, the containers should be transported to the Hazardous Waste Accumulation Site for disposal by an outside waste disposal firm.

#### b. Aqueous Based Waste

- Aqueous based waste is defined as liquid waste composed of greater than 50% water and not containing solvents, halogenated wastes, or incompatible materials as defined in part "d" of this section and in Section 4.2.5.
- These wastes are generally disposed of by adjusting the pH of the material to between 5 and 9 and combining the material with a non-halogenated solvent waste stream.

# c. Solvent Based Waste

- Solvent-based waste is defined as liquid waste composed of organic solvents but not containing halogenated or incompatible materials as defined in part "d" of this section and in Section 4.2.5.
- Solvent-based waste can be properly disposed by combining in an appropriately labeled container and shipping off-site for disposal when full. Note that solvent based wastes are typically managed as hazardous wastes.

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#### d. Halogenated Waste

- Halogenated waste is defined as waste containing elemental or organically bound fluorine, chlorine, bromine, or iodine and not containing incompatible materials as defined in Section 4.2.5.
- Examples of such materials are chloroform, methylene chloride, and carbon tetrachloride.
- Halogenated wastes should be placed in an appropriately labeled container, separate from the non-halogenated waste stream, and disposed off-site when full.
- Halogenated wastes are typically managed as hazardous wastes.

#### e. Nonhazardous Liquid Waste

- Small amounts (< 1 gallon) of nonhazardous waste aqueous solutions (i.e., sodium chloride solutions) may be discharged and drained.
- The Safety and Environmental Representative should evaluate requests for discharging and draining prior to any disposal of larger volumes.

#### 4.2.3. Solid Wastes

#### a. Hazardous Solids

- Solid hazardous wastes which contain no incompatible materials as defined in Section 3.5 may be disposed by dissolving in an appropriate solvent and disposing as liquid waste as outlined in Section 3.2.
- Note that this should only be done with small amounts of material (< 1 pound).</li>
- Alternatively, solid hazardous wastes, and liquid wastes containing incompatible materials should be separated according to compatibility and hazard type, and sorted for disposal by a hazardous waste contractor with lab-pack capabilities.

#### b. Nonhazardous Soilds

- Nonhazardous solids may be disposed of as normal solid waste.
- Care must be taken in the determination of a waste as nonhazardous before a decision regarding ultimate disposal is made.

# 4.2.4. Gas Wastes

#### a. Nonhazardous Gases

 Nonhazardous compressed gases should be completely used and the cylinders returned to the vendor for reuse.

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TOPIC	SECTION
CHEMICAL DISPOSAL GUIDELINES	200.03-PRO

# b. Hazardous Gases

- Unused hazardous compressed gases may be returned to the vendor if a suitable agreement is worked out beforehand.
- Otherwise, they should be collected and stored for off-site disposal by a suitable hazardous waste disposal firm.

## 4.2.5. Incompatible Materials

- a. Incompatible materials are defined as highly reactive, toxic, or unstable chemical compounds. Examples include, but are not limited to, strong oxidizing and reducing agents, organic peroxides, ethers, reactive monomers, cyanides, sulfides, azo-compounds, iocyanates, or heavy metals. To properly dispose of these materials, either render them chemically inert (i.e., through chemical reaction) or dispose of them as outlined in the guidelines for solid waste disposal in Section 4.2.3.
- b. The Safety and Environmental Representative should review any request for treatment of incompatibles prior to such treatment.
- 5. REFERENCES
- 6. APPENDICES

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CommScope Recycle-Reuse Guidelines



1	TOPIC	SECTION
	RECYCLE- REUSE GUIDELINES	444.01-PRO

#### 1. OBJECTIVE

1.1. To provide for a system and instructions for dealing with normal production waste, office and municipal type waste and any other special circumstances waste. Procedure provides general information on separation, collection, and removal.

#### 2. SCOPE

2.1. The scope is to formalize CommScope's commitment to recycle and reuse the resources used in all CommScope facilities.

#### 3. CONTENTS

- 4.1. Accountability-Coordinators
  - 4.1.1. Accountability
  - 4.1.2. Coordinators

#### 4.2. Guidelines listed in Tables

- 4.2.1. Guidelines for Materials Recycle/ Reuse in all Administrative/Facility Office areas
- 4.2.2. Guidelines for Materials Recycle/ Reuse in Manufacturing/warehousing areas
- 4.2.3. Guidelines for Recycle of Raw Material- Production Wastes

# 4. PROGRAM

#### 4.1. Accountability and Coordinator(s)

## 4.1.1. Accountability

All employees; every employee is involved with materials that can be recycled or reused.

# 4.1.2. Coordinator(s)

**EHS Management** 

Recycling Manager

#### 4.2. Guidelines Listed in Tables

The following tables list many items that can and should be recycled; however, if there are items to be recycled that are not on this list, then consult the EHS representative to assist in the determination for recycle, reuse or landfill disposal through the universal, non-hazardous, hazardous, recycle/reuse management systems

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TOPIC	SECTION
RECYCLE- REUSE GUIDELINES	444.01-PRO

# 4.2.1 Guidelines for Materials Recycle/ Reuse in all Administrative/Facility Office areas

This section gives the general guidelines for recycling non production related items.

This section gives the general guidelines for recycling non-production related items.			
	Put materials in recycling containers designated for aluminum cans, plastic bottles and glass.		
Bottles and Cans (Aluminum, Plastic, etc.)	Note; broken glass should not be replaced in recycle to prevent waste-handling staff injury.  Place a rigid outer container, (plastic ware or cardboard), mark as "broken glass," and place it in a regular trash receptacle.		
	Have the appropriate vendor pickup for recycling		
Cafeteria/food	Segregate the recyclables, i.e., glass, cans, plastic containers, corrugated cardboard from food waste; dispose food waste according to local (city, state guidelines). Food waste should be disposed of according to local city/county ordinates.		
Sel vice materials	Have the appropriate vendor pickup for recycling		
	Flatten cardboard boxes.		
Cardboard	Place corrugated cardboard in recycle dumpsters marked "cardboard only."		
	Have the appropriate vendor pickup for recycling		
	Computers that are functional and not outdated; consider reuse by donation to a charity or local schools through DOE under Executive Order 12999.		
Computers / Electronics	Non usable Computers/Electronics should be collected, dismantled and segregated to base components/materials of plastic, wire, circuit boards, metals and glass.		
	The materials should be sorted (plastics, metal, glass (CRTs), etc.) in order to ship those to proper vendor waste streams for recycling and reuse.		
	Office furniture that is functional/reusable, consider reuse within the facility or the company; also consider donating to a charity or local school		
Office furniture	Non reusable furniture, dismantie and segregate into the wood, plastic and metal components and dispose of according to the type of waste.		
	Have the appropriate vendor pickup for recycling		
Paper (Magazines,	Remove any plastic or large metals, i.e. spirals, plastic covers, metal rings, etc.		
Newspaper, Office Paper, Phonebooks)	Place materials in dedicated recycling containers, designated for the paper type (newspaper, copy, magazines, etc).		
	Have the appropriate vendor pickup for recycling		
Toner Cartridges	Place used cartridges in the new/replacement cartridge or vendor return supplied package.		
(Printer and Toner)	Take to the appropriate vendor for recycling or credit for your next purchase.		

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TOPIC	SECTION
RECYCLE- REUSE GUIDELINES	444.01-PRO

# 4.2.2 Guidelines for Materials in the Manufacturing/warehousing areas

This section gives the general guidelines for recycling non production related items and some maintenance items not covered under hazardous waste management.

	Empty, depressurize and allow any contents to be removed from the aerosol can.
Aerosol Cans (lubricants, cleaning	Determine the material disposition and if needed to be handled as a hazardous waste according to the Hazardous Waste Management
solutions, pesticides, etc.)	Store the scrap aerosol cans and mark "Empty Aerosol Cans" on the label.
	Have the appropriate vendor pickup for recycling
	Segregate batteries by type
Batteries for	Lead-acid batteries not being regenerated (e.g., electrolyte replacement) or reclaimed must be managed in accordance with the Hazardous Waste Management.
Reclamation of Recycling	Alkaline batteries manufactured after May 13, 1996 may be disposed of in the trash.
Recycling	For batteries other than lead-acid (automotive type), dispose through the Hazardous Waste Program
	Have the appropriate vendor pickup for recycling
	Determine if there is any reuse or resale value; if so, dispose through the reuse/resale venue.
	Segregate metal as designated by the product and requirements of the recycler.
Building materials	Segregate all non metals as feasible from manufacturing waste/excess raw materials.
(concrete, wood, steel, etc.)	Determine there is not any hazardous or regulated substances (such as PCBs, mercury, asbestos);
	Dispose according to the type of material/ waste being eliminated.
	Have the appropriate vendor pickup for recycling
	Segregate to No. 1 Cardboard-Corrugated, UTV Copper Weld Reel Wraps, No. 2 Cardboard- Fiber Drums, Fiberboard, Recycled Cardboard and all other cardboard using in the packaging processes.
Cardboard; Packaging materials	Place these designated cardboards into their respective dumpsters/recycle bins labeled with the appropriate cardboard type.
	Have the appropriate vendor pickup for recycling

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# 4.2.2 Guidelines for Materials in the Manufacturing/warehousing areas continued

	<u> </u>
	Determine if there is any reuse or resale value; if so, dispose through the reuse or resale venue.
Excess production- warehouse Equipment	Any equipment not reusable, remove any parts, i.e. motors, switches, etc. that could be reused or recycled. Dismantle and segregate into the wiring, metal, wood, plastic components and dispose of according to the type of waste.
	Determine if the material contains hazardous or regulated substances (such as PCBs, mercury, asbestos; dispose according to the proper hazardous waste disposal management.
	Materials such as Freon, fuels, motor oils and/or hydraulic or vacuum oils must be removed and channeled to the proper hazardous waste disposal management.
	Have the appropriate vendor pickup for recycling
Scrap Metal -non production areas-	Segregate metals and all non metals as feasible from the manufacturing waste and excess raw materials; collect the materials in appropriate containers that do not leak.
maintenance, steel Bands,	Determine if the material contains hazardous or regulated substances (such as PCBs, mercury, asbestos; dispose according to the proper hazardous waste disposal management.
miscellaneous materials etc.	Materials such as Freon, fuels, motor oils and/or hydraulic or vacuum oils must be removed and channeled to the proper hazardous waste disposal management.
Universal Wastes	Dispose of according to universal waste protocol.
	Collect used oil filters as industrial waste; drain fluids from the filter for proper disposal.
Used Oil Filters	Determine the material disposition and if needed to be handled as a hazardous waste according to the Hazardous Waste Management
	Collect oil filters in an appropriate container for storage and mark appropriately (hazardous or non hazardous.
	Collect all shipping pallets, flanges, maintenance materials that use wood/lumber.
Wood	Any materials that cannot be reused should be collected for recycling
	Have the appropriate vendor pickup for recycling

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#### 4.2.3 Guidelines for Recycle of Raw Material- Production Wastes

This section was developed based on the current CommScope procedures used to segregate the product mix waste and the recycled product waste's final destination. The information was derived from referencing the Catawba procedures, Catawba Scrap Disposition Instructions, PWI 005-0601 and Scrap Reporting Procedures PWI 005-600 and 2006 EHS Recycle Materials Disposition.

The general guidelines are as follows:

- a. Determine the material to be recycled and categorize based on Table 4.2.3 below;
- b. Segregate the material and place in the recycle containers as designated;
- c. Ship the material to the accumulation facility for disposition;
- Keep accurate records of the amounts shipped by tracking the waste-recycle material through means such as but not limited to production reports, shipping manifests, etc.
- e. Have a central location for collection of data to retain for a minimum of 3 years.
- f. These records will be required for the yearly government reporting of Toxic Release inventory data.

Table 4.2.3 - Raw Material - Production Wastes Basic Guidelines

	Recycle container-storage			Current final destination			
Material recycled	Вох	Metal bin	Reel- Coil	Domestic	International	Country-State	
CATV mixed	Y	Y	Υ		Y	China	
NW Cu bearing	Y	Y	Υ		Y	China	
CR cable	Y		Y		Y	China	
CR core	Y		Υ		Y	China	
Lowend Drop	Y		Υ		Y	China	
Lowend Drop	Y		Y	Υ		AL	
1350 AL strip	Υ	Y		Y		IN, MO, NC, PA	

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Table 4.2.3 - Raw Material - Production Wastes Basic Guidelines continued

	Recycle container-storage			Current final destination		
Material recycled	Box	Metal bin	Reel- Coil	Domestic	International	Country-State
1350 AL Rods	Y	Υ		Υ		PA
1350 AL shavings	Y	Y		Y		MA
1350 AL shavings	Υ	Υ			Y	China
5154 AL	Υ		· · · · · · · · · · · · · · · · · · ·	Y		PA
5154 AL	Υ				Y	China
AL foil tape	Υ	Υ		Y		СТ
Cu Clad Steel (CCS)	Y		Y		Y	China
Cu Clad Steel (CCS)	Y		Υ	Y		MI
Cu Clad AL (CCA)	Y		Y	Y		MA, WI
Cu Clad AL (CCA)	Υ		Υ		Υ	China
Copper Pkg A	Y	Υ		Y		AL,WI,MO,NC
Copper Pkg A	Υ	Υ			Y	China
Copper Pkg B	Y				Υ	China
1060 chopped	Υ			Y		NC
Talwan	Υ				Y	China
FEP Reclaimed	Υ			Y		СТ
Aramid Scrap	Y			Y		NC
PVC	Y			Υ		SC
PVC, Plenum	Y			Y		SC
PVC Reclaimed	Y			Υ		NC
PE sold	Υ			Y		GA
Comp flanges	Y			Y		GA

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# 5. REFERENCES

- 5.1. EPA section; Reduce, Reuse, and Recycle guidelines
- 5.2. Catawba Scrap Disposition Instructions, PWI 005-0601
- 5.3. Catawba Scrap Reporting Procedures PWI 005-600
- 5.4. Catawba EHS Recycle Materials Disposition.

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CommScope Recycling & Conservation Manager Job Description

# CommScope Job Description

Job Title:

Recycling & Conservation Manager

Division:

Procurement

FLSA Status:

Exempt

Reports To:

Vice President, Procurement

# General Summary:

Manage CommScope's recycling and conservation efforts to include communication, training, and development of policies, practices, and procedures to conserve resources. Establish and monitor waste stream separation of plastics, metals and paper products. Coordinate continuous improvements in waste reduction and recycling. Manage the return of reels for reuse and the sale of scrap.

# **Duties and Responsibilities:**

- Maximize revenue stream from sales of scrap recyclables.
- Maintain relationship with domestic and international buyers of scrap and waste.
- Minimize cost incurred to dispose of unmarketable scrap and waste.
- Develop and implement systems to separate reusables and recyclables from waste stream to use, recycle, or sell.
- Negotiate contract custodial services for office areas.
- Direct plant custodians.
- Purchase and inventory custodian supplies for plant and office.
- Direct grounds maintenance and continuous improvement of outside appearance.
- Encourage environmental awareness throughout organization.
- Reduce use and abuse of gloves, tools, energy, and supplies through teams and training.

- Seek other outlets for waste, to avoid going to landfill.
- Orient new employees on recycling policies.
- Lead energy conservation teams across divisions and identify opportunities.
- Manage direct reports.
- Manage outside contractors and consultants...

# Job Specifications:

Bachelor's degree in a related curriculum and a minimum of 3 years of related recycling, conservations, purchasing, or environmental compliance experience required. Must be self-directed and have excellent communication and organizational skills. Moderate travel required.

CommScope Manufacturing Facilities USEPA RCRA Numbers

Legacy

Manuf. Facility address Haz Waste

6519 CommScope Rd Catawba, NC 28609 NCD 982090508

3642 Hwy 70 east Claremont, NC 28610 NCD986185106

125 CommScope Way Statesville, NC 28625 NCR 000008284

1285 Southern Way Sparks, NV 89431 NVR000073650

1545 St. James Church Rd

Newton, NC28658

NCR000136481

117 Lequire St Scottsboro, AL ALR000000265

Facility closed Dec 2008

# **Systimax**

1200 I Street

NED007259054

Omaha, NE

1300 E. Lookout Dr.

TXCESQG

Richardson, Tx 75082

TXR000048397 formerly

# **Andrew Solutions**

Acquired Dec 2007 (not part of CommScope during the potential era of this investigation.